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BRANDREP, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

A1 ON TRACK SLIDING DOOR
REPAIR AND INSTALLATION,
INC. and DEBORAH SCHICK,
individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

BRANDREP, LLC, a Delaware
limited liability company,

Defendant.

Case No. 3:21-CV-03013-SI

**JOINT STIPULATION TO
CONTINUE THE CASE
DEADLINES**

The Parties, Defendant Brandrep, LLC (“Brandrep” or “Defendant”) and Plaintiffs A1 On Track Sliding Door Repair and Installation, Inc. (“A1”) and Deborah Schick (“Schick,” collectively “Plaintiffs”) submit this Joint Stipulation to Continue the Case Deadlines.

**A. THE PARTIES PARTICIPATED IN THE COURT-ORDERED
MEDIATION**

On May 5, 2022, the Parties participated in court-ordered mediation with mediator Jeffrey Grubman, Esq. As a result of the mediation, the Parties believe that Plaintiffs’

confidential review of Defendant's financial information would assist the Parties in resolving this case with minimal further litigation and significantly increase the chances of an early resolution in this case. Defendant Brandrep would need time to pull together its financials for the confidential disclosure. Plaintiffs would need time to review the disclosures and evaluate its settlement position.

B. THE PARTIES BELIEVE THAT A TWO-MONTH CONTINUANCE OF THE CASE DEADLINES WOULD ASSIST IN RESOLUTION OF THIS CASE

The Parties believe that a two-month continuance of all case deadlines would help facilitate the settlement of this case. The reprieve would allow the Parties to evaluate and discuss settlement without the escalation that the existing case deadlines impose. The Parties believe a two-month continuance would significantly increase the chances of an early resolution in this case.

Accordingly, the Parties jointly agree, stipulate and request that the deadlines be extended as set forth below:

<u>Event</u>	<u>Deadline/Date</u>	<u>Proposed New Date</u>
Non-expert Discovery Cutoff	June 30, 2022	August 30, 2022
Plaintiff's Expert Disclosures	July 15, 2022	September 16, 2022
Defendant's Expert Disclosures	August 5, 2022	October 7, 2022
Rebuttal Expert Disclosures	August 19, 2022	October 21, 2022
Expert Discovery Cutoff	August 31, 2022	November 2, 2022
Plaintiff to File Motion for Class Certification	September 2, 2022	November 4, 2022
Opposition to Class Certification Due	September 16, 2022	November 18, 2022
Reply in Support of Class Certification Due	September 23, 2022	November 25, 2022
Hearing on Class Certification	October 7, 2022, 10:00 a.m.	December 9, 2022, 10:00 a.m.

Dated: May 6, 2022

LEGAL SOLUTIONS 2 U
A Professional Corporation

/s/ Patrick L. Blair
Patrick L. Blair
Attorney for Defendant
Brandrep, LLC

Dated: May 6, 2022

By: /s/ Taylor T. Smith

Taylor T. Smith
Attorney for A1 ON TRACK SLIDING DOOR REPAIR AND INSTALLATION, INC. and DEBORAH SCHICK, individually and on behalf of all others similarly situated,

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SIGNATURE CERTIFICATION

Pursuant to Civil L.R. 5-1(i)(3) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Plaintiffs and that I have obtained authorization to affix his or her electronic signature to this document.

By: /s/ Patrick L. Blair
Patrick L. Blair

PROOF OF SERVICE

ORANGE COUNTY)
) ss.
STATE OF CALIFORNIA)

I am employed in Orange County, California. I am over the age of eighteen and not a party to the within action. My business address is 18201 Von Karman, Ste. 701, Irvine, California 92616.

On May 6, 2022, I served the following document described as:

JOINT STIPULATION TO CONTINUE THE CASE DEADLINES

On the following interested parties in this action:

Taylor T. Smith
Via CM/ECF
Attorney for plaintiffs
Email: tsmith@woodrowpeluso.com

Rebecca L. Davis
Via CM/ECF
Attorney for plaintiffs
Email: rebecca@lozeaudrury.com

[X] VIA CM/ECF to the above email addresses.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Executed on May 6, 2022, at Irvine, California.

/s/ Ron Kort
Ron Kort